

**FILED**  
JEANNE A. NAUGHTON, CLERK

AUG - 3 2020

U.S. BANKRUPTCY COURT  
TRENTON, NJ  
BY [Signature] DEPUTY

HARDIN, KUNDLA, MCKEON & POLETTA

COUNSELLORS AT LAW  
A PROFESSIONAL CORPORATION

673 MORRIS AVENUE  
SPRINGFIELD, NEW JERSEY 07081

(973) 912-5222  
FAX (973) 912-9212

www.HKMPP.com

Michael A. Cifelli  
mcifelli@hkmpp.com

NEW YORK OFFICE  
110 William Street  
New York, New York 10038  
(212) 571-0111  
FAX (212) 571-1117

PENNSYLVANIA OFFICE  
60 West Broad Street  
Suite 102  
Bethlehem, Pennsylvania 18018  
(610) 433-8400  
FAX (610) 433-0300

July 28, 2020

Honorable Michael B. Kaplan, J.U.S.B.C.  
U.S. Bankruptcy Court  
U.S. Courthouse, 2<sup>nd</sup> Floor  
402 East State Street  
Trenton, New Jersey 08608

**RE: Hollister Construction Services, LLC**  
**Case No.: 19-27439**  
**File No.: 9443.46397**

Dear Judge Kaplan:

Please be advised that this office represents claimed creditor, Meridia Transit Plaza Urban Renewal, Dover, LLC ("Meridia") in a separate legal/administrative proceeding. Please accept this letter in response to the Motion for Relief filed by Lutz, Inc. Meridia takes no position as to the merits of the motion but objects to the factual allegations asserted therein.

Otherwise, we note that it is questionable whether Lutz will be able to proceed at arbitration. Meridia has no contract with Lutz and Meridia has reserved its right to object to any direct claim by Lutz in the AAA proceeding.

Otherwise, whether Lutz's motion is meritorious under applicable law is within the jurisdiction of this Court.

Respectfully Submitted,

Michael A. Cifelli/s

Michael A. Cifelli

MAC:lrp

cc: Robert T. Lawless, Esq.  
Greg Trif, Esq.  
Gregg A. Ilardi, Esq.  
Mary E. Seymour, Esq.